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13 *Attorneys for Plaintiffs*

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 DAVID HOUGH; *et al.*

17 Plaintiffs,

18 vs.

19 RYAN CARROLL; *et al.*

20 Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**DISCOVERY DOCUMENT TO BE
ROUTED TO THE HONORABLE
STEVE KIM**

**UPDATED PROOF OF SERVICE
REGARDING MOTION TO HOLD
HSBC BANK USA NA IN
CONTEMPT OF COURT**

Hearing: August 28, 2024, 10:00 am
Presiding Judge: Hon. Steve Kim
Trial Date: N/A

21 **UPDATED PROOF OF SERVICE REGARDING MOTION TO HOLD HSBC**
22 **BANK USA NA IN CONTEMPT OF COURT**

23
24 I, Nico Banks, have personal knowledge of the matters set forth below and if
25 called to testify, I would do so competently.
26
27
28

- 1 1. I am an attorney representing Plaintiffs in this matter.
- 2 2. As noted in the proof of service for Plaintiffs motion to hold HSBC Bank
- 3 USA, National Association in contempt, I served that corporation with that
- 4 motion by mailing the motion via first class mail to the following address:
- 5

6 HSBC BANK USA, NATIONAL ASSOCIATION
7 c/o Corporation Trust Company
8 818 W Seventh St.,
9 Los Angeles, CA 90017

- 10 3. The mail referenced in the above paragraph has now been returned to me
- 11 marked "return to sender" and "unable to forward."
- 12 4. Exhibit A is a true and correct copy of a filing I obtained from the
- 13 California Secretary of State's website, which states that C T Corporation
- 14 System (a.k.a. the "Corporation Trust Company") is HSBC Bank USA,
- 15 National Association's registered agent.
- 16 5. Exhibit B is a true and correct copy of an email thread that I exchanged with
- 17 C T Corporation. I have not received a response from C T Corporation to
- 18 date.
- 19 6. For the reasons described above, I believe I have validly served HSBC
- 20 Bank USA, National Association, but I have not received an
- 21 acknowledgment of receipt or other response from that corporation to date.
- 22

23 I declare under penalty of perjury that the foregoing is true and correct.

24 /s/Nico Banks

1 Dated: August 20, 2024

2 /S/ Nico Banks

3 Nico Banks (CA SBN:344705)

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15 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

On August 20, 2024, I served this proof of service via first-class mail to the following address:

HSBC BANK USA, NATIONAL ASSOCIATION
c/o Corporation Trust Company
818 W Seventh St.,
Los Angeles, CA 90017

I also emailed this proof of service to the following email addresses:

SOPInquiries@wolterskluwer.com
maya.dillon@us.hsbc.com
Meredith.Friedman@hsbc.com
us.agency.escalation@us.hsbc.com
cecilia.d.gottman@us.hsbc.com

I declare under penalty of perjury that the foregoing is true and correct.

/s/Nico Banks
Dated: August 20, 2024